

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

DANIEL BLACK,

Plaintiff,

v.

Civil Action No. 2:17-cv-00156

DAVID A. CLARKE, JR., et al.

Defendants.

DECLARATION OF KURT SIMATIC

KURT SIMATIC declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct:

1. I am one of the attorneys for defendants, Milwaukee County and David A. Clarke, Jr. in the above-captioned matter.

2. I make this declaration based upon my own personal knowledge of the facts attested to herein.

3. Attached hereto and marked as **Exhibit A** is a true and correct copy of the transcript from the deposition of Daniel Black, taken on August 28, 2017.

4. Attached hereto and marked as **Exhibit B** is a true and correct copy of the transcript from the deposition of Tina Moore, taken on June 13, 2017.

5. Attached hereto and marked as **Exhibit C** is a true and correct copy of Exhibit 3 to Tina Moore's deposition.

6. Attached hereto and marked as **Exhibit D** is a true and correct copy of Exhibit 2 to Tina Moore's deposition.

7. Attached hereto and marked as **Exhibit E** is a true and correct copy of the transcript from the deposition of Edward H. Bailey, taken on May 25, 2017.

8. Attached hereto and marked as **Exhibit F** is a true and correct copy of the transcript from the deposition of Captain Mark W. Witek, taken on May 17, 2017.

9. Attached hereto and marked as **Exhibit G** is a true and correct copy of the transcript from the deposition of Deputy Steven J. Paull, taken on May 17, 2017.

10. Attached hereto and marked as **Exhibit H** is a true and correct copy of Exhibit 2 to Deputy Steven J. Paull's deposition.

11. Attached hereto and marked as **Exhibit I** is a true and correct copy of the transcript from the deposition of Deputy Jeffrey T. Hartung, taken on May 18, 2017.

12. Attached hereto and marked as **Exhibit J** is a true and correct copy of surveillance video depicting the area of Gates D54 and D55 inside of Concourse D of General Mitchell International Airport, on January 15, 2017, from approximately 2:25 p.m. to approximately 2:36 p.m., produced by plaintiff during the course of this lawsuit.

13. Attached hereto and marked as **Exhibit K** is a true and correct copy of surveillance video depicting the main walkway of Concourse D, west view, in the area of Gate D30 on January 15, 2017, at approximately 2:50 p.m., produced by plaintiff during the course of this lawsuit.

14. Attached hereto and marked as **Exhibit L** is a true and correct copy of BLACK 000001, produced by plaintiff during the course of this lawsuit.

15. Attached hereto and marked as **Exhibit M** is a true and correct copy of BLACK 000043-BLACK 000057 and BLACK 000059-BLACK000060, emails to various news outlets sent by plaintiff's attorney during the course of this lawsuit.

16. Attached hereto and marked as **Exhibit N** is a true and correct copy of a video news story posted to WTMJ Channel 4's website on February 2, 2017, relating to this lawsuit.

17. Attached hereto and marked as **Exhibit O** is a true and correct copy of a video news story posted to FOX Channel 6's website on February 2, 2017, relating to this lawsuit.

18. Attached hereto and marked as **Exhibit P** is a true and correct copy of a Snapchat video filmed by Daniel Black inside General Mitchell International Airport, on January 15, 2017.

Dated this 11th day of September, 2017.

s/ Kurt Simatic

Kurt Simatic